

Commonwealth of Massachusetts
Department of Telecommunications and Energy
Fitchburg Gas and Electric Light Company
Docket No. D.T.E. 02-25
Responses to the Attorney General's First Set of Information Requests

Request No. AG-1-61

Please provide the following information regarding the Company's insurance policies:

- (1) a breakdown of the insurance expenses recorded in each of the years 2000 and 2001 and, for each insurance expense, please provide a detailed explanation for any differences between the expense amounts included in the year and the insurance premiums paid during that year;
- (2) the invoices for the insurance premiums paid in each of the years 2000 and 2001 and, if the Company only pays a portion of the insurance expense, please provide a summary of each insurance invoice showing the total expense and the Company's allocated portion of the expense;
- (3) if any insurance expense (including premiums) recorded in each of the years 2000 and 2001 have been allocated or assigned to the Company from any affiliate, please indicate the amount allocated or assigned and the method of assignment and provide copies of all policies for which expenses are allocated or assigned; and
- (4) an itemization and quantification of any insurance proceeds (e.g. reimbursements, recoveries, refunds, distributions, adjustments) received by the Company during or since the year 2000, along with a complete and detailed description of the accounting treatment given those proceeds.

Response:

- (1) Please refer to AG-1-61 Attachment 1.
- (2) and (3) Please refer to Common Discovery* AG-1-61 Attachments 2 and 3 for copies of 2001 and 2000 insurance invoices. The amounts charged to FG&E are detailed on the Summary of Insurance Invoices page. See Common Discovery* AG-1-61 Attachments 4 and 5 (bulk attachments) for copies of 2001 and 2000 insurance policies. The premiums for certain insurance coverages for the Unitil Companies are paid by Unitil Service Corporation and allocated to the various companies per an allocation methodology. Workers Compensation coverage has a specific policy for the Company, and no allocation is necessary. Workers comp is the only coverage that is specific by company. There are two allocation methodologies, specific and general. Some coverages use a specific unit to develop the allocation. For example Auto Liability uses the number of vehicles as the unit. The second type of allocation, is a general allocator, which is used for coverages where there is no definable unit, such as Excess Liability and Directors' & Officers' Liability. For these coverages the 41.2% general allocator is used and that 2001 allocation calculation is shown on Common Discovery* AG-1-61 Attachment 6. This general allocator is a weighted

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average of Plant, Revenues and Salaries. These are the factors that are reported and used by the insurance carrier in it's determination of premiums.

(4) There were no refunds received in 2000 or 2001.

* Common Discovery is any attachment that is identical for D.T.E. 02-24 and D.T.E 02-25.

Person Responsible: Mark H. Collin